

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

ROY COCKRUM, ET AL.,

*Plaintiffs,*

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,

*Defendant.*

Case No. 3:18-cv-484-HEH

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**DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

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Jeffrey Baltruzak  
JONES DAY  
500 Grant Street, Suite 4500  
Pittsburgh, PA 15219  
(412) 391-3939  
jbaltruzak@jonesday.com

Michael A. Carvin  
Nikki L. McArthur  
Vivek Suri  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001  
(202) 879-3939  
macarvin@jonesday.com  
nmcarthur@jonesday.com  
vsuri@jonesday.com

*Counsel for Donald J. Trump for President, Inc.*

In accordance with Federal Rule of Civil Procedure 12(b)(6), Defendant Donald J. Trump for President, Inc. respectfully moves that the Court dismiss all claims with prejudice for failure to state a claim upon which relief can be granted.

Dated: October 8, 2018

Respectfully submitted,

Jeffrey Baltruzak\*  
JONES DAY  
500 Grant Street, Suite 4500  
Pittsburgh, PA 15219  
(412) 391-3939  
jbaltruzak@jonesday.com

/s/ Nikki L. McArthur  
Michael A. Carvin\*  
Nikki L. McArthur (Virginia Bar No. 84174)  
Vivek Suri\*  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001  
(202) 879-3939  
macarvin@jonesday.com  
nmcarthur@jonesday.com  
vsuri@jonesday.com

\* *Pro hac vice*

*Counsel for Donald J. Trump for President, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on October 8, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all registered parties.

Dated: October 8, 2018

/s/ Nikki L. McArthur

Nikki L. McArthur

*Counsel for Donald J. Trump for President, Inc.*